

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,  
Plaintiffs,  
v.  
MICHAEL J. LINDELL and MY  
PILLOW, INC.,  
Defendants.

Case No. 22-cv-0098-JMB-JFD

**STATEMENT INSTEAD OF REDACTION**

The following exhibits to Smartmatic's Memorandum in Support of its Motion to Exclude the Opinion and Testimony of Benjamin Cotton have been filed under seal in accordance with Local Rule 5.6(d) as follows:

| <b>Exhibit</b> | <b>Description of Document</b>                                  | <b>Reason for Filing Document Under Seal</b>   |
|----------------|---|--|
| <b>B</b>       | August 8, 2024 Transcript of Deposition of Benjamin Cotton      | Transcript marked as Confidential  |
| <b>C</b>       | September 22, 2023 Smartmatic Expert Report of Tammy Patrick    | Produced in Discovery- Entire Document is labeled as Confidential                        |
| <b>E</b>       | September 22, 2023 Smartmatic Expert Report of Dr. Alan Sherman | Produced in Discovery- Entire Document is labeled as Confidential – Attorney’s Eyes Only |

Dated: November 13, 2024

Respectfully submitted,

/s/ Timothy M. Frey

Christopher K. Larus

Minnesota Bar No. 0226828

CLarus@robinskaplan.com

William E. Manske

Minnesota Bar No. 0392348

WManske@robinskaplan.com

Emily J. Tremblay

Minnesota Bar No. 0395003

ETremblay@robinskaplan.com

**ROBINS KAPLAN LLP**

800 LaSalle Avenue, Suite 2800

Minneapolis, MN 55402

Telephone: (612) 349-8500

J. Erik Connolly (admitted *pro hac vice*)

EConnolly@beneschlaw.com

Illinois ARDC No. 6269558

Nicole E. Wrigley (admitted *pro hac vice*)

NWrigley@beneschlaw.com

Illinois ARDC No. 6278749

Timothy M. Frey (admitted *pro hac vice*)

TFrey@beneschlaw.com

Illinois ARDC No. 6303335

Julie M. Loftus (admitted *pro hac vice*)

JLoftus@beneschlaw.com

Illinois ARDC No. 6332174

**BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

71 South Wacker Drive, Suite 1600

Chicago, IL 60606

Telephone: (312) 212-4949

James R. Bedell (admitted *pro hac vice*)

JBedell@beneschlaw.com

Ohio Bar No. 97921

**BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

127 Public Square, Suite 4900

Cleveland, OH 44114

Telephone: (216) 363-4500

*Attorneys for the Plaintiffs*